

1 J. Stephen Peek
Nevada Bar No. 1758
2 HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
3 Las Vegas, NV 89134
Phone: (702) 222-2544
4 Fax: (702) 669-4650
speek@hollandhart.com
5 raloosvelt@hollandhart.com

6 Brett L. Foster (pro hac vice admission)
Tamara L. Kapaloski (pro hac vice admission)
7 DORSEY & WHITNEY LLP
111 S. Main Street Suite 2100
8 Salt Lake City, UT 84111-2176
Telephone: (801) 933-7360
9 Facsimile: (801) 933-7373
foster.brett@dorsey.com
10 kapaloski.tammy@dorsey.com

11 *Attorneys for Plaintiff Snap Lock Industries, Inc.*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 **SNAP LOCK INDUSTRIES, INC.,**

15 Plaintiff,

16 vs.

17 **SWISSTRAX CORPORATION,**

18 Defendant.

Case No. 2:17-cv-02742-RFB-PAL

**JOINT STIPULATED MOTION TO STAY
MARCH 12 HEARING ON MOTION FOR
PROTECTIVE ORDER PENDING
SETTLEMENT DISCUSSIONS AND
[PROPOSED] ORDER**

(FIRST REQUEST)

19
20 Plaintiff Snap Lock Industries, Inc. ("Snap Lock") and Defendant Swisstrax Corporation
21 ("Swisstrax") (collectively, "Parties"), through their undersigned counsel, hereby respectfully jointly
22 submit this Joint Stipulated Motion To Stay March 12 Hearing On Motion For Protective Order
23 Pending Settlement Discussions, and state as follows:

24 1. Currently pending before this Court is Snap Lock's Emergency Motion for Protective
25 Order Regarding Subpoenas ("Motion for Protective Order"). See ECF No. 92.

26 2. A hearing on the Motion for Protective Order is currently scheduled for March 12, 2019.
27 See ECF No. 106.
28

1 3. Also currently pending before this Court is Swisstrax's Motion to Compel. *See* ECF
2 No. 102. The Motion to Compel is fully briefed, but a hearing on the motion has not been scheduled.

3 4. The deadline for completing expert discovery in this case is April 30, 2019, and the
4 deadline for filing dispositive motions is May 30, 2019. *See* ECF No. 115. The Parties will take a total
5 of six expert depositions and anticipate that both Parties will file one or more dispositive motions.

6 5. The Parties have agreed to engage in a settlement conference or mediation within the
7 next 60 days, to be completed by May 6, 2019, in an attempt to resolve this dispute. To allow the
8 parties to dedicate their efforts to the potential settlement of this dispute, and to preserve judicial and
9 party resources in the event that settlement negotiations dispose of the case, the parties hereby jointly
10 request that the Court stay all case deadlines to allow the Parties to conduct a settlement conference or
11 mediation.

12 6. As a result of this, on March 8, 2019, the Parties filed a Joint Stipulation to Continue
13 Case Deadlines Pending Settlement Discussions. *See* ECF No. 116. In that filing, the Parties requested
14 that the deadlines for completing expert discovery and for filing dispositive motions be stayed, pending
15 the conclusion of the settlement conference or mediation by or on May 6, 2019.

16 7. The Parties hereby also respectfully request that the hearing related to the Motion for
17 Protective Order scheduled for March 12, 2019, be vacated, and that it be continued to a date after May
18 6, 2019, as necessary, if the parties are unable to resolve their dispute.

19 8. The Parties do not currently have a trial date.

20 9. Good cause exists for this request. Staying the case deadlines, including the March 12
21 hearing on Motion for Protective Order, will preserve the resources of both the Court and the parties
22 in the event that the ongoing settlement negotiations dispose of this dispute. The Parties are not seeking
23 the extensions for purposes of undue delay.

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1 Dated this 11th day of March, 2019.

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3 DORSEY & WHITNEY LLP

4 /s/ Tamara L. Kapaloski

5 Brett L. Foster
6 Tamara L. Kapaloski
7 Dorsey & Whitney, LLP
8 111 South Main Street, Suite 2100
9 Salt Lake City, UT 84111-2176
10 Email: foster.brett@dorsey.com
11 Email: kapaloski.tammy@dorsey.com

DICKINSON WRIGHT PLLC


/s/ Steven A. Caloiaro

John L. Krieger
Steven A. Caloiaro
Christian T. Spaulding
8363 West Sunset Road, Suite 200
Las Vegas, NV 89113
Email: jkrieger@dickinson-wright.com
Email: scaloiaro@dickinson-wright.com
Email: cspaulding@dickinson-wright.com

9 **ORDER**

10 **IT IS ORDERED** that the hearing on the Motion for Protective Order (ECF No. 92)
11 currently set for March 12, 2019 is **VACATED**.

12 Dated: March 11, 2019

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14 Peggy A. Leen
15 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of March, 2019, the foregoing **JOINT STIPULATED MOTION TO STAY MARCH 12 HEARING ON MOTION FOR PROTECTIVE ORDER PENDING SETTLEMENT DISCUSSIONS AND [PROPOSED] ORDER** was served via e-mail upon the following:

J. Stephen Peek
Nevada Bar No. 1758
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Phone: (702) 222-2544
Fax: (702) 669-4650
speek@hollandhart.com

Attorneys for Plaintiff Snap Lock Industries, Inc.

John L. Krieger
Steven A. Caloiaro
Christian T. Spaulding
DICKINSON WRIGHT PLLC
8363 West Sunset Road, Suite 200
Las Vegas, NV 89113-2210
jkrieger@dickinson-wright.com
scaloiaro@dickinsonwright.com
cspaulding@dickinsonwright.com

Attorneys for Defendant Swisstrax Corporation

/s/ Tamara L. Kapaloski